

JAN 17 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA

DOCKET NO. 3:24-cr-13-FDW

v.

BILL OF INDICTMENT

(1) **MARCUS MAYFIELD**
(2) **KAIONTA DABNEY**

Violations: 18 U.S.C. § 2119
18 U.S.C. § 924(c)
18 U.S.C. § 2

THE GRAND JURY CHARGES:

COUNT ONE
(Carjacking)

On or about January 11, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendants,

(1) MARCUS MAYFIELD and
(2) KAIONTA DABNEY,

with intent to cause death and serious bodily harm, did unlawfully take from the person and presence of R.P. by force, violence and intimidation, a motor vehicle, that is, a 2019 Dodge Hellcat, that had been shipped, transported, and received in interstate commerce, and did aid and abet this offense; all in violation of Title 18, United States Code, Sections 2119 and 2.

COUNT TWO

(Possession and Brandishing of a Firearm in Furtherance of a Crime of Violence)

On or about January 11, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendants,

(1) MARCUS MAYFIELD and
(2) KAIONTA DABNEY,

did knowingly possess one or more firearms in furtherance of a crime of violence for which the defendants may be prosecuted in a court of the United States, that is, carjacking, a violation of Title 18, United States Code, Section 2119, as set forth in Count One of this Bill of Indictment, incorporated by reference herein, and did aid and abet this offense.

It is further alleged that one or more of said firearms were brandished, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

All in violation of Title 18, United States Code, Sections 924(c) and 2.

NOTICE OF FORFEITURE

Notice is hereby given of the provisions of 18 U.S.C. § 924(d) and the statutes incorporated or referred to therein.

A TRUE BILL



FOREPERSON

DENA J. KING
UNITED STATES ATTORNEY



TIMOTHY SIELAFF
ASSISTANT UNITED STATES ATTORNEY